

Jeffrey F. Barr (NV Bar No. 7269)
8275 South Eastern Avenue, Suite 200
Las Vegas, NV 89123
(702) 631-4755
barrj@ashcraftbarr.com

Thomas R. McCarthy* (VA Bar No. 47145)
Gilbert C. Dickey* (VA Bar No. 98858)
Conor D. Woodfin* (VA Bar No. 98937)
1600 Wilson Boulevard, Suite 700
Arlington, VA 22209
(703) 243-9423
tom@consovoymccarthy.com
gilbert@consovoymccarthy.com
conor@consovoymccarthy.com

Sigal Chattah (NV Bar No. 8264)
5875 S. Rainbow Blvd #204
Las Vegas, NV 89118
(702) 360-6200
sigal@thegoodlawyerlv.com

**Admitted pro hac vice*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

REPUBLICAN NATIONAL COMMITTEE,
NEVADA REPUBLICAN PARTY, and SCOTT
JOHNSTON,

Plaintiffs,

v.

FRANCISCO AGUILAR, *in his official capacity
as Nevada Secretary of State*; LORENA
PORTILLO, *in her official capacity as the
Registrar of Voters for Clark County*; WILLIAM
"SCOTT" HOEN, AMY BURGANS, STACI
LINDBERG, and JIM HINDLE, *in their official
capacities as County Clerks*,

Defendants.

No. 2:24-cv-00518-CDS-MDC

**PLAINTIFFS'
UNOPPOSED MOTION
FOR EXTENSION OF
TIME TO AMEND
COMPLAINT**

Last week, the Court issued an order granting the motions to dismiss. *See* Doc. 121. The Court ordered the Plaintiffs to file a motion for leave to amend the complaint by November 1, 2024. The Plaintiffs file this unopposed motion requesting an additional 10 days to amend their complaint.

1 There is good cause to extend the deadline by ten days. *See* Fed. R. Civ. P. 6.
2 The Plaintiffs' amended complaint is currently due four days before the national
3 federal election on November 5. Appellants—the Republican National Committee,
4 Nevada Republican Party, and the Donald J. Trump campaign—have numerous
5 obligations before and after election day, as do their counsel. Those obligations become
6 more numerous and more urgent as the election nears.

7 For example, Plaintiffs and their counsel have been involved in numerous
8 emergency lawsuits over the past month that affect registration, voting, and the
9 administration of the upcoming election. *E.g.*, *Ga. State Conf. of the NAACP v. Kemp*,
10 No. 1:24-cv-4546 (N.D. Ga. Oct. 7, 2024) (TRO proceedings filed and resolved within
11 four days); *Abhiraman v. State Election Board*, No. 24CV010786 (Ga. Super. Ct. Aug.
12 26, 2024) (pending decision on bench trial expedited one month after the complaint
13 was filed); *Eternal Vigilance Action, Inc. v. State of Georgia*, No. 24CV011558 (Ga.
14 Super. Ct. Aug. 26, 2024) (expedited trial and Georgia Supreme Court petition
15 resolved this week).

16 These emergency proceedings often require putting other briefing obligations
17 on hold. For example, the RNC and undersigned counsel have an Eleventh Circuit
18 brief due on October 30, the day before amendment is due in this case. But because
19 briefing in that case is consolidated, the RNC has less leeway to request an extension.
20 The election season requires parties to prioritize cases that will affect the upcoming
21 election. But this is not one of those cases. Plaintiffs thus request an additional ten
22 days to file their motion for leave to amend the complaint, to avoid briefing that motion
23 in the midst of the national election. No party opposes this extension request.

1 Dated: October 25, 2024

Respectfully submitted,

2 /s/ Jeffrey F. Barr

3 Thomas R. McCarthy*
4 VA Bar No. 47145
Gilbert C. Dickey*
5 VA Bar No. 98858
Conor D. Woodfin*
6 VA Bar No. 98937
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8 tom@consovoymccarthy.com
gilbert@consovoymccarthy.com
9 conor@consovoymccarthy.com

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ASHCRAFT & BARR LLP
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Suite 200
Las Vegas, NV 89123
(702) 631-4755
barrj@ashcraftbarr.com

*Counsel for the Republican
National Committee and Scott
Johnston*

10 /s/ Sigal Chattah

11 *admitted pro hac vice

12 *Counsel for Plaintiffs*

Sigal Chattah
NV Bar No. 8264
CHATTAH LAW GROUP
5875 S. Rainbow Blvd #204
Las Vegas, NV 89118
(702) 360-6200
sigal@thegoodlawyerlv.com

*Counsel for the Nevada
Republican Party*